

MICHELE BECKWITH
Acting United States Attorney
CALVIN LEE
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ALBERTO RUIZ-ZAMORA,

Defendant.

CASE NO. 1:25-CR-00042-KES-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
AND ORDER

DATE: March 26, 2025
TIME: 10:30 a.m.
COURT: Hon. Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status conference on March 26, 2025.
2. The parties have met and conferred and agree that the status conference should be continued to a later date. Defendant's counsel will need time to review the produced discovery. Accordingly, the parties' preference would be to set the case for a status conference on May 7, 2025.
3. By this stipulation, defendant now moves to continue the status conference until May 7, 2025, and to exclude time between March 11, 2025, and May 7, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].
4. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case

1 includes reports, audio recordings, and surveillance footage. All this discovery has been either
2 produced directly to counsel and/or made available for inspection and copying.

3 b) Counsel for defendant desires additional time to review the discovery, conduct
4 independent investigation, consult with his client, and discuss a pretrial resolution of the case
5 with the government.

6 c) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny him/her the reasonable time necessary for effective preparation, taking
8 into account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of March 26, 2025 to May 7, 2025,
15 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
16 because it results from a continuance granted by the Court at defendant's request on the basis of
17 the Court's finding that the ends of justice served by taking such action outweigh the best interest
18 of the public and the defendant in a speedy trial.

19 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
20 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
21 must commence.

22 IT IS SO STIPULATED.

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25 Dated: March 11, 2025

MICHELE BECKWITH
Acting United States Attorney

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28 /s/ CALVIN LEE

CALVIN LEE
Assistant United States Attorney

Dated: March 11, 2025

/s/ Laura Myers
Laura Myers
Counsel for Defendant
MIGUEL ALBERTO RUIZ-
ZAMORA

ORDER

IT IS SO ORDERED that the status conference is continued from March 26, 2025, to **April 23, 2025, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time is excluded between March 11, 2025, and May 7, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **March 12, 2025**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE